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The Honorable Pamela K. Chen
United States District Judge
United States Courthouse
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

May 17, 2022

Re: United States v. Jeffrey Webb, et al., 15 Cr. 252 (PKC)

Dear Judge Chen:

On behalf of our client Mr. Jeffrey Webb, we write with the consent of the government to respectfully request that the Court modify the conditions of release under Mr. Webb's bail to remove his home curfew and location monitoring requirement.

For background, on June 22, 2017, the Court modified Mr. Webb's conditions of release to allow him to travel anywhere in the state of Georgia, subject to a home curfew with location monitoring between the hours of 10:00 P.M. to 7:00 A.M. In that same order, the Court also allowed Mr. Webb to travel outside the state of Georgia and within the continental United States without any curfew limitation if he obtains the pre-approval of Pretrial Services and gives prior notice to the FBI. Mr. Webb has abided with his conditions of release without any incident.

If this request is granted, Mr. Webb will be able to travel without any curfew limitation or location monitoring requirement. Mr. Webb's ability to travel outside of the state of Georgia, however, will still be subject to pre-approval by Pretrial Services and prior notice to the FBI.

All other existing bail conditions and conditions of release shall remain the same, including the condition that Mr. Webb's passport shall remain in the custody of the FBI.

We have consulted with Assistant United States Attorney M. Kristin Mace and Pretrial Services Officer Bianca C. Carter in the Eastern District of New York, and they have no objection to the requested modification.

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Thank you for your consideration of this request.

Respectfully submitted,

/s/ Ernie Gao
Rijie Ernie Gao

cc: United States Attorney's Office, Eastern District of New York (by ECF)
Pretrial Services Office, Eastern District of New York (by e-mail)